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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CIVIL ACTION NO 16-MD-2738 (FLW) (LHG)

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IN RE JOHNSON & JOHNSON : DAUBERT HEARING
POWDER PRODUCTS MARKETING, : JULY 25, 2019
SALES PRACTICES. : VOLUME 4
----- :

CLARKSON S. FISHER UNITED STATES COURTHOUSE
402 EAST STATE STREET, TRENTON, NJ 08608

B E F O R E: THE HONORABLE FRED A. L. WOLFSON, USDJ

A P P E A R A N C E S:

BEASLEY ALLEN, ESQUIRES
BY: P. LEIGH O'DELL, ESQUIRE (ALABAMA)
-and-
ASHCRAFT & GEREL, ESQUIRES
BY: MICHELLE A. PARFITT, ESQUIRE (VIRGINIA)
-and-
LEVIN PAPANTONIO, ESQUIRES
BY: CHRISTOPHER V. TISI, ESQUIRE (FLORIDA)
-and-
ROBINSON CALCAGNIE, ESQUIRES
BY: CYNTHIA L. GARBER, ESQUIRE (CALIFORNIA)
behalf of the Plaintiffs Steering Committee

DRINKER, BIDDLE & REATH, ESQUIRES
BY: SUSAN M. SHARKO, ESQUIRE (NEW JERSEY)
JULIE L. TERSIGNI, ESQUIRE (NEW JERSEY)
-and-
SKADDEN, ARPS, SLATE, MEAGHER & FLOM, ESQUIRES
BY: JOHN H. BEISNER, ESQUIRE (WASHINGTON, D.C.)
-and-
PROSKAUER ROSE, ESQUIRES
BY: BART H. WILLIAMS, ESQUIRE (CALIFORNIA)
On behalf of Defendant Johnson & Johnson
(Continued)

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VINCENT RUSSONIELLO, RPR, CRR, CCR
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1 case-control study.

2 Q. You reviewed it?

3 A. Yes.

4 Q. You reviewed Gates 2010 also relating to the
5 Nurses' Health Study. Right?

6 A. Yes.

7 Q. You reviewed the Houghton 2014 study?

8 A. Yes.

9 Q. That report relates to the Women's Health
10 Initiative on which you worked. Right?

11 A. Yes.

12 Q. You also reviewed the Gonzalez 2016 study
13 reporting on the Sister Study cohort. Right?

14 A. Yes.

15 Q. Those are five papers reporting results from
16 three prospective cohort studies that you reviewed.
17 Right?

18 A. Yes.

19 Q. True or not true: Every single one of the
20 prospective cohort studies that you reviewed in
21 forming your opinions in this case reports an overall
22 risk estimate for genital talc use and ovarian cancer
23 that has a confidence interval crossing 1.0?

24 A. Yes. Usually I talk about the relative risk and
25 then I talk about the confidence interval. I don't

1 usually talk about just one, but, yes.

2 Q. I'm not asking you what you talk about. Is the
3 answer to my question yes?

4 A. As an epidemiologist, I don't just talk about
5 confidence intervals and about p-Values. I talk about
6 relative risk for consistency.

7 THE COURT: When he asks you a question,
8 respond to the question that he has.

9 THE WITNESS: Okay.

10 THE COURT: He is only focusing on that for
11 the moment. I know we've heard your testimony about
12 how you viewed it all day tomorrow, so we understand
13 that.

14 MR. WILLIAMS: Thank you, your Honor.

15 Q. In 100 percent of the prospective cohort studies
16 there was no overall association found between genital
17 talc use and ovarian cancer. Correct?

18 A. I would have to disagree with that.

19 Q. If confidence interval includes the number 1,
20 then we say the association between the exposure and
21 the disease could be null. Correct?

22 A. I agree with that.

23 Q. In 100 percent of the prospective cohort studies
24 you could not rule out the possibility that the true
25 relative risk in each and every one of the prospective

1 studies is null. Correct?

2 A. I cannot -- say it again. Just repeat it. I
3 think it's close to what I understand, but, please.

4 Q. You cannot rule out the possibility that the
5 true relative risk in each and every one of the
6 prospective cohort studies is null?

7 A. Correct.

8 Q. "Null" means zero, right, nonexistent?

9 A. It means non-association or a relative risk of
10 1.

11 Q. You cannot identify any prospective cohort study
12 concluding that there was a statistically significant
13 overall association between talc use and ovarian
14 cancer. True?

15 A. True.

16 Q. It is your opinion an association between
17 genital talc use and ovarian cancer risk is highly
18 consistent across case-control and cohort studies
19 across those study designs. That's your opinion.
20 Right?

21 A. Yes.

22 Q. One of the reasons that you did not perform your
23 own meta-analysis in this case was because you
24 believed the recently published Penninkilampi and
25 Berge meta-analyses were in your words excellent